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February 7, 2002

VIA UPS NEXT DAY AIR

Ms. Carlyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

**Re: Conoco Inc. Response to EPA's Request for Information dated 12/20/2001
regarding the Lower Darby Creek Area Superfund Site in Delaware and
Philadelphia Counties, Pennsylvania**

Dear Ms. Winter Prisk:

This letter and its attachments constitute the response of Conoco Inc. ("Conoco") to the U.S. Environmental Protection Agency's (EPA) Request for Information, dated December 20, 2001, regarding the Lower Darby Creek Area Superfund Site – Clearview Landfill, Folcroft Landfill and Folcroft Landfill Annex (the "Site"). As you will recall, you agreed to extend Conoco's response deadline until February 10, 2002.

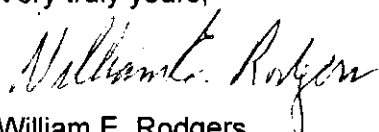
Nothing contained herein shall be interpreted or construed as an admission or waiver of any claims, rights or defenses as Conoco Inc. reserves any and all claims, rights and defenses relating to the matters addressed herein including the right to amend or supplement this response. Should such information or records be located or identified pursuant to these efforts, Conoco Inc. will provide supplements to this response.

As a courtesy, should EPA, or its contractors, desire to contact present or past company employees regarding this matter, Conoco respectfully requests that you contact Stephen P. Chung, Conoco Counsel, at 281-293-6231.

Please direct any further communications for Conoco Inc. regarding this matter to:

Ellen P. Hebert
Senior Legal Assistant
Conoco Inc.
Legal - Suite ML 2144
600 North Dairy Ashford
Houston, TX 77079
Phone: (281) 293-5442
Fax: (281) 293-4255
E-Mail: ellen.p.hebert@conoco.com

Very truly yours,



William E. Rodgers
Program Manager

cc: Catherine Abercrombie, Remediation Technology, Conoco
Stephen P. Chung, Legal, Conoco
Ellen P. Hebert, Legal, Conoco

Attachment A: Conoco 2000 Annual Report

CONOCO INC. (CONOCO)
RESPONSES TO EPA's 12/20/01 REQUEST FOR INFORMATION
regarding the
Lower Darby Creek Area Superfund Site
Clearview Landfill, Folcroft Landfill, and Folcroft Landfill Annex
Delaware and Philadelphia Counties

These responses are not and should not be taken as an admission or waiver of any kind to the jurisdiction, statutory authority or regulatory authority of the United States Environmental Protection Agency (EPA) for this information request or any EPA remedial actions.

QUESTIONS AND RESPONSES

1. State the name of your company, its mailing address, and telephone number. Further identify:
 - a. The dates and states of incorporation of your company,
 - b. The date and original state of incorporation of your company, and
 - c. The parent corporation of your company, if any, and all subsidiaries or other affiliated entities.

Conoco Response:

A copy of Conoco's latest Annual Report (2000) is enclosed. Additional information, including SEC filings, are available to the public for viewing on Conoco's Internet website (www.conoco.com).

2. What is the current nature of the business or activity conducted at your establishment(s) in the Philadelphia, Pennsylvania area, including but not limited to the facility in Trainer, Pennsylvania? What was the nature of your business or activity between 1958 and 1976? Please describe in detail. If the nature of your business or activity changed from the period of 1958 to 1976 to the present, please provide a detailed explanation of the changes to date.

Conoco Response:

Conoco does not have any current business locations in Delaware or Philadelphia Counties in Pennsylvania.

Conoco had businesses located at the following addresses:

7000 Route 13

Levittown, PA (Philadelphia, County)

This service station was sold to Robert W. Clayton on August 26, 1982.

2702 Market St.

Chester, PA (Delaware County)

This service station was donated to a Trust for Public Land on December 2, 1986.

Trainer, PA (Delaware County)

Bryton Chemical Company, a partnership composed of Robert L. Anderson, Jeanette M. Anderson, Vernon G. Beyer, Dorothy E. Beyer, E. Waldemar Carlson and Emily H. Carlson, owned and operated a chemical plant located in Trainer, Pennsylvania which Conoco purchased on September 1, 1952. The partnership operated the Trainer plant until July 1, 1957 when Conoco took over the plant operations. The Trainer plant primarily produced petroleum sulfonates which were used as detergent additives for motor oils. On May 11, 1973, Conoco sold the assets of its Bryton Chemical Company Division to Witco Chemical Corporation at which time the business, employment and operational records would have been transferred to the buyer.

3. Identify all persons currently or formerly employed by your establishment(s) who have or may have personal knowledge of your operations and waste disposal practices between 1958 and 1976 at your facilities in the Philadelphia, Pennsylvania area, including but not limited to, the Trainer facility. For each such person, state that person's employer, job title, dates of employment, current address, and telephone number. If the current telephone number or address is not available, provide the last known telephone number or last known address of such person.

Conoco Response:

Conoco has not located any information to date that is responsive to this request. Conoco is currently in the process of conducting a diligent search of company records and interviews with company employees and will supplement this response should any information become available.

4. Identify the owners and operators of your establishment(s) in the Philadelphia area, including but not limited to the Trainer, PA facility, from 1958 to the present. For each owner and operator further provide:
 - a. The dates of their operation;
 - b. The nature of their operation; and

- c. All information or documents relating to the handling and/or generation, storage, treatment, recycling, formulation, disposal, or transportation of any hazardous substance, hazardous waste, pollutant, contaminant, or other waste during the period in which they were operating the establishment(s)

Conoco Response:

Please refer to the response to Question No. 2. Conoco has not located any information to date that is responsive to this request. Conoco is currently in the process of conducting a diligent search of company records and interviews with company employees and will supplement this response should any information become available.

- 5. Describe the types of documents generated or maintained by your establishment(s) in the Philadelphia area, including but not limited to the Trainer, PA facility, concerning the handling and/or generation, storage, treatment, transportation, recycling, formulation, or disposal of any hazardous substance, hazardous waste, pollutant, contaminant or other waste between 1958 and 1976.
 - a. Provide a description of the information included in each type of document and identify the person who was/is the custodian of the documents;
 - b. Describe any permits or permit applications and any correspondence between your company and/or establishment(s), and any regulatory agencies regarding the transportation and disposal of such wastes; and
 - c. Describe any contracts or correspondence between your company and/or establishment(s) and any other company or entity regarding the transportation and disposal of such wastes.

Conoco Response:

Please refer to the response to Question No. 3.

- 6. Identify every hazardous substance used, generated, purchased, stored, or otherwise handled at Bryton Chemical's facilities in the Philadelphia area, including but not limited to the Trainer, PA facility, between 1958 and 1976. Provide chemical analyses and Material Safety Data Sheets ("MSDS"). With respect to each such hazardous substance, further identify
 - a. The process(es) in which each hazardous substance was used, generated, purchased, stored, or otherwise handled;

- b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such hazardous substance,
- c. The annual quantity of each such hazardous substance used, generated, purchased, stored, or otherwise handled;
- d. The beginning and ending dates of the period(s) during which such hazardous substance was used, generated, purchased, stored, or otherwise handled;
- e. The types and sizes of containers in which these substances were transported and stored; and
- f. The persons or companies that supplied each such hazardous substance to your company.

Conoco Response:

Please refer to the response to Question No. 3.

7. Identify all by-products and wastes generated, stored, transported, treated, disposed of, released, or otherwise handled by Bryton Chemical's facilities in the Philadelphia area, including but not limited to the Trainer, PA facility, between 1958 and 1976. With respect to each such by-product and waste identified, further provide:
- a. The process(es) in which each such by-product and waste was generated, stored, transported, treated, disposed of, released, or otherwise handled;
 - b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such by-product or waste;
 - c. The annual quantities of each such by-product and waste generated, stored, transported, treated, disposed of, released, or otherwise handled;
 - d. The types, sizes, and numbers of containers used to treat, store, or dispose of each such by-product or waste;
 - e. The name of the individual(s) and/or company(ies) that disposed of or treated each such by-product or waste; and
 - f. The location and method of treatment and/or disposal of each such by-product or waste.

Conoco Response:

Please refer to the response to Question No. 3.

8. Did your company ever contract with, or make arrangements with Clearview, Folcroft, Folcroft Annex, Eastern Industrial, Tri-County Hauling, S. Buckly Trash Hauling, Barratt Rupurt, McCloskey Engineering, ABM Disposal Services, Marvin Jonas, Jonas Waste Removal, Paolino Company, Schiavo Bros., Inc, Gene Banta Trash Hauling, and/or any other company or municipality to remove or transport material from Bryton Chemical's facilities in the Philadelphia area, including but not limited to the Trainer, PA facility, between 1958 and 1976 for disposal? If so, for each transaction identified above, please identify:
- a. The person with whom you made such a contract or arrangement;
 - b. The date(s) on which or time period during which such material was removed or transported for disposal;
 - c. The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);
 - d. The annual quantity (number of loads, gallons, drums) of such material;
 - e. The manner in which such material was containerized for shipment or disposal;
 - f. The location to which such material was transported for disposal;
 - g. The person(s) who selected the location to which such material was transported for disposal;
 - h. The individuals employed with any transporter identified (including truck drivers, dispatchers, managers, etc.) with whom your establishment dealt concerning removal or transportation of such material; and
 - i. Any billing information and documents (invoices, trip tickets, manifests, etc. in your possession regarding arrangements made to remove or transport such material.

Conoco Response:

Please refer to the response to Question No. 3.

9. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons who, between 1958 and 1976, may have:
- Disposed of or treated materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site;
 - Arranged for the disposal or treatment of materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site; and/or
 - Arranged for the transportation of materials to Clearview, Folcroft and Folcroft Annex or other areas of the Site (either directly or through transshipment points) for disposal or treatment.

Conoco Response:

Please refer to the response to Question No. 3.

10. For every instance in which your Bryton Chemical disposed of or treated material at Clearview, Folcroft and Folcroft Annex or other areas of the Site, or arranged for the disposal or treatment of material at the Site, identify:
- The date(s) on which such material was disposed of or treated at the Site;
 - The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);
 - The annual quantity (number of loads, gallons, drums) of such material;
 - The specific location on the Site where such material was disposed of or treated; and

Conoco Response:

Please refer to the response to Question No. 3.

11. Did Bryton Chemical, or any other company or individual ever spill or cause a release of any chemicals, hazardous substances, and/or hazardous waste, and/or non-hazardous solid waste on any portion of Clearview, Folcroft and Folcroft Annex or any other portion of the Site? If so, identify the following:
- The date(s) the spill(s)/release(s) occurred;

- b. The composition (i.e., chemical analysis) of the materials which were spilled/released;
- c. The response made by you or on your behalf with respect to the spill(s)/release(s); and
- d. The packaging, transportation, and final disposition of the materials which were spilled/released.

Conoco Response:

Please refer to the response to Question No. 3.

12. Please identify individuals employed by your establishment(s) who were responsible for arranging for the removal and disposal of wastes, and individuals who were responsible for payments, payment approvals, and record keeping concerning such waste removal transactions at Bryton Chemical's facilities in the Philadelphia area, including but not limited to the Trainer, PA facility, between 1958 and 1976. Provide current or last known addresses and telephone numbers where they may be reached. If these individuals are the same persons identified by your answer to question 3, so indicate.

Conoco Response:

Please refer to the response to Question No. 3.

13. Did you or any person or entity on your behalf ever conduct any environmental assessments or investigations relating to contamination at Clearview, Folcroft and Folcroft Annex or any other areas of the Site? If so, please provide all documents pertaining to such assessments or investigations.

Conoco Response:

Please refer to the response to Question No. 3.

14. If you have any information about other parties who may have information which may assist the EPA in its investigation of the Site, including Clearview, Folcroft and Folcroft Annex, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, telephone number, type of business and the reasons why you believe the

party may have contributed to the contamination at the Site or may have information regarding the Site.

Conoco Response:

Please refer to the response to Question No. 3.

15. Representative of your establishment(s):
- a. Identify the person(s) answering these questions on behalf of your establishment(s), including full name, mailing address, business telephone number, and relationship to the company.
 - b. Provide the name, title, current address, and telephone number of the individual representing your establishment(s) to whom future correspondence or telephone calls should be directed.

Conoco Response:

William E. Rodgers
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Remediation Technology
Conoco Inc.
600 N. Dairy Ashford, Suite PO 3044
Houston, TX 77079-1175
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Stephen P. Chung, Esq.
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Ellen P. Hebert
Senior Legal Assistant
Conoco Inc.
600 N. Dairy Ashford, Suite ML 2144
Houston, TX 77079-1175
Tel.: 281-293-5442

Please direct all future communications to Ellen P. Hebert as indicated above.

16. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:
- a. Your document retention policy;
 - b. A description of how the records were/are destroyed (burned, archived,

trashed, etc) and the approximate date of destruction;

- c. A description of the type of information that would have been contained in the documents; and
- d. The name, job title, and most current address known to you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

Conoco Response:

Please refer to the response to Question No. 3. Conoco's document retention policy is as follows:

Policy Statement

All Conoco records should be promptly destroyed in the ordinary course of business according to the periods established in the Conoco Retention Guide. Retention periods listed in the guide are as short as possible in order to minimize our record inventory. Retention periods are based on legal, tax, audit or defined business needs. This guide has been approved by the Records Retention Committee as the corporate authority for the retention of records.

Company records include all paper, microform, electronic or other information media created or received by Conoco in the ordinary course of business. The retention periods apply to all records regardless of location including all company locations, off-site locations, in computer storage or employees' homes.

All records received or created in the course of company business are company property and must be managed in line with retention standards.

Each employee is responsible and accountable for their own records. These records include those records created by the employee and all other Conoco records in the employees' possession from whatever source.

Conoco management is responsible and accountable to manage records according to this standard. Records Coordinators are appointed by management to:

- 1. Implement the Records Management Program in each business area;*
- 2. Approve and submit retention schedule revisions to Records Management;*
- 3. Ensure staff with centralized or group records management responsibilities (Records Specialists) are knowledgeable and trained in records management procedures;*

4. *Ensure employees understand record management responsibilities and participate in annual clean-up program;*
5. *Attest that business is complying with records retention standard.*

The destruction of specified records will be suspended when a Hold Order is placed to support litigation or regulatory proceeding.

The Conoco Retention Guide does NOT establish retention periods for books, journals, reports, manuals, software, videos, brochures or other PUBLISHED material in the public domain. This includes publications issued by commercial, government and not for profit organizations. However, in the interests of reducing unnecessary storage costs and inefficiencies, individuals and groups should only keep material that meets an active defined business need. All COPYRIGHT laws concerning the reproduction and distribution of copyrighted material must be followed.

As to Bryton Chemicals, Conoco has not located documents to date that are responsive to this information request because on May 11, 1973, Conoco sold the assets of its Bryton Chemical Company Division to Witco Chemical Corporation at which time the business, employment and operational records would have been transferred to the buyer.

EPA REGION III
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REPORT OR DOCUMENT TITLE	<u>104 (E) Response-</u> <u>Canoco INC</u>
DATE OF DOCUMENT	<u>Feb. 7, 02</u>
DESCRIPTION OF IMAGERY	<u>Canoco ANNUAL Report</u> <u>Book</u>
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